

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF WEST VIRGINIA
AT CHARLESTON**


JOSEPH R. GOODWIN
UNITED STATES DISTRICT JUDGE

**IN RE: C.R. BARD, INC., PELVIC
REPAIR SYSTEM PRODUCTS
LIABILITY LITIGATION**

**Master File No. 2:12-MD-02187
MDL No. 2187**

**THIS DOCUMENT RELATES TO
THE CASES ON THE EXHIBIT
ATTACHED HERETO**

**JOSEPH R. GOODWIN
U.S. DISTRICT JUDGE**

JOINT MOTION TO DISMISS WITH PREJUDICE

Plaintiffs, whose cases are listed on the attached Exhibit A, and Defendants Johnson & Johnson, Inc. and Ethicon, Inc. (collectively, the “Ethicon Defendants”) jointly move the court to dismiss with prejudice this action and all claims against the Ethicon Defendants which were, or could have been asserted, pursuant to F. R. Civ. P. 41(a)(1)(A)(ii). Each party shall bear her or its own costs.

Respectfully submitted,

/s/ Laura J. Baughman

Laura J. Baughman
Baron & Budd, P.C.
3102 Oak Lawn Ave., Ste. 100
Dallas, TX 75219
(214) 521-3605
lbaughman@baronbudd.com
Counsel for Plaintiffs

/s/ William M. Gage

William M. Gage (MS Bar #8691)
Butler Snow LLP
1020 Highland Colony Parkway
Suite 1400 (39157)
P.O. Box 6010
Ridgeland, MS 39158-6010
(601) 985-4561
william.gage@butlersnow.com

/s/ Susan M. Robinson

Susan M. Robinson (W. Va. Bar #5169)
Thomas Combs & Spann PLLC
300 Summers Street
Suite 1380 (25301)
P.O. Box 3824